

SHER TREMONTE LLP

March 4, 2025

BY ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Trooper 1 v. NYSP et al., 22-cv-893 (LDH) (TAM)*

Dear Judge Merkl:

We write once again regarding Lindsey Boylan's request that the Court prevent her deposition. Ms. Boylan's flagrant public and online conduct over the past two weeks has been a blatant contradiction of the arguments that her counsel has made to this Court. Indeed, her behavior seriously calls into question the good-faith nature of those arguments. Ms. Boylan continues to bully and harass individuals who have been supporting Governor Cuomo, including individuals who are material witnesses to this case. Her intimidation efforts confirm not only that she can sit for a deposition, but that she must.

On March 1, 2025, just six weeks after Ms. Boylan's attorneys argued to this Court that she should not have to sit for a deposition concerning Trooper 1's allegations about Ms. Boylan (ECF No. 305), just two weeks after her counsel argued that [REDACTED]

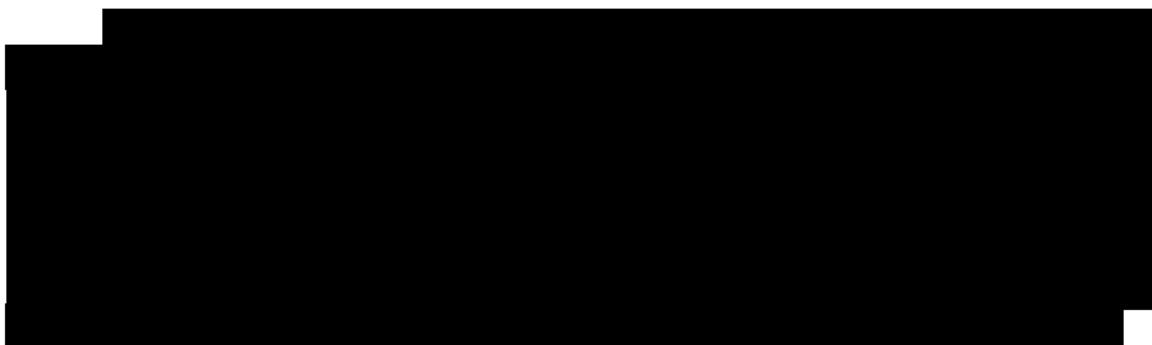
[REDACTED] and just days after Ms. Boylan reposted a reference to Representative Hakeem Jeffries with the "N word" (ECF No. 329), Ms. Boylan has continued her despicable public harassment and bullying campaign.

[REDACTED]

Hon. Taryn A. Merkl

March 4, 2025

Page 2 of 3



While Ms. Boylan is undoubtedly entitled to speak out publicly, she cannot do that and dodge a deposition at the same time, and she certainly should not be able to do that in

Hon. Taryn A. Merkl

March 4, 2025

Page 3 of 3

a way that terrorizes witnesses and others. Trooper 1 filed her complaint more than three years ago, and Trooper 1, like the OAG and many others, relied heavily on Ms. Boylan to pad her otherwise-weak allegations (a decision that increased defense costs in this case tenfold if not more). Unless and until Trooper 1 disclaims any reliance on Ms. Boylan and the OAG Report, due process requires that Ms. Boylan be required to testify under oath in front of a lawyer who will not simply credit her provably false allegations, as the OAG did, but who will confront her with clear evidence of her lies and witness intimidation.

It is long past time for Ms. Boylan to be held accountable.

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma